KAREN P. HEWITT
United States Attorney
880 Front Street, Room 6293
San Diego, CA 92101
Telephone: (619) 557-5610

CAROLINE A. NEWMAN
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Ben Franklin Station
Washington, D.C. 20044-0683
Telephone: (202) 305-2558
Facsimile: (202) 307-0054
Caroline.A.Newman@usdoj.gov
Western.TaxCivil@usdoj.gov

Attorneys for the United States of America

THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

RODNEY M. TOOTHACRE, Plaintiff, v. UNITED STATES OF AMERICA, INTERNAL REVENUE SERVICE Defendant.	Case No. 07-cv-2289-DMS-WMC **UNITED STATES' MOTION TO STAY PROCEEDINGS** **[ORAL ARGUMENT IS NOT REQUESTED.]**

The United States of America, by and through its undersigned counsel, hereby moves this Court to stay this proceeding until the Plaintiff's case currently pending in Tax Court, No. 26357-06, is resolved.

///

///

///

A memorandum in support of this motion is submitted herewith.

DATED this 18th day of June, 2008.

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

By: /s Caroline A. Newman

CAROLINE A. NEWMAN
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 305-2558

Attorneys for United States